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12 October, 2009

Office of General Counsel **Federal Election Commission** 999 E Street NW Washington, D.C. 20463 RECEIVED CERAL ELECTION COMMISSION SECRETARIAT

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OFFICE OF GENERAL Subject: 2008 ELECTION FINANCE COMPLABOURS PLICATION PAC

SENSITIVE

1: Complainant name and address: William James Scoggin

MUR #

Lemoore, CA. 93245

- 2: Complaint #1: IN 2008, TRANSFUND PAC CLAIMED MULTI CANDIDATE STATUS WITHOUT MEETING FULL QUALIFICATION
- Transfund PAC is a Leadership PAC affiliated with Rep. Kilpstrick (D-MI). A thorough review of FEC - Transfund PAC public access correspondence shows Transfund PAC improperly amended their status to a multi campaign PAC in July 2008.
- Transfund PAC amended status to 'multi candidate' effective 01 July 2008. indicating their 51st person contributed on 6-30-08. A review of all individual person contributors reported on schedule A indicates that isn't the case.
- c. A review of 'persons' (includes individuals and groups) shows Transfund PAC received one contribution on 6-30-08 from Clear Channel PAC. In order for this to qualify as the 51" person, 50 persons would have been required to contribute on or before that date. However, a review of attachment (a) identifies a total of 50 persons (including Kilpatrick as the first donor) covering the entire 2008 election cycle. Clear Channel PAC was in fact the 47th donor. Transfund PAC never attained 51 persons at any point during the cycle, and thus never qualified for multi-candidate status.
- d. Furthermore, please note that two persons (Gildon / Robinson) contributed a total of six times and were counted as six persons. To claim 51 persons for eligibility purposes, Transfund counted Gildon and Robinson's individual contributions as six 'persons' for the 2008 cycle. This error can be duplicated from Schedule A by counting each itemized contribution as a person. Multiple donors should only count as one person. According to Title 11 covering Federal Elections (§ 100.10 Person (2 U.S.C. 431(11)) "Person means an individual, partnership, committee, association, corporation, labor organization, and any other organization, or group of persons."
 - e. Refer to attachments (a) and (b).
- 3: Complaint #2: TRANSFUND PAC EXCEEDED CONTRIBUTION LIMITS TO **FEDERAL CANDIDATES**

- a. As a non-multi candidate who sought to improperly amend their status, Transfund PAC exceeded the legal limit for campaign contributions as reported on Schedule B.
- b. On July 16th 2008, Transfund PAC made two contributions to KILPATRICK FOR CONGRESS in the amount of \$5000 each for two separate elections, totaling \$10,000. As a non-multi candidate PAC, this exceeded the legal limit by \$5400.
- c. On 09-30-08, Transfund PAC made one contribution to DAN SEALS FOR CONGRESS in the amount of \$2000 and again on 10-31-08 in the amount of \$1000, totaling \$3000. Both contributions were made to one 'General Election' in the same cycle, exceeding the legal limit by \$700.00
 - d. Refer to attachments (c) and (d).
- 4: Complaint #3: ARTHUR BLACKWELL'S 2008 ELECTION CONTRIBUTIONS TO REP. KILPATRICK EXCEED INDIVIDUAL CONTRIBUTION LIMITS
 - a. According to FEC limits placed on individual contributions, "A contribution earmarked for a candidate through a political committee counts against the original contributor's limit for that candidate. In certain circumstances, the contribution may also count against the contributor's limit to the PAC. 11 CFR 110.6. See also 11 CFR 110.1(h)."
 - b. Summary of Blackwell's individual contributions to a single candidate:
 - (1): \$5000 to the Kilpatrick Leadership PAC on 01/26/07
 - (2): \$500 to Kilpatrick on 11/2/07
 - (3): \$1000 to Kilpetrick on 6-30-08
 - Amount contributed to a single candidate exceeds the individual limit by \$1500.
 - d. Refer to attachments (a) and (e).

Sincerely.

William James Scoggin

State of: California County of: Kings

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this/2	day o	f <u>Oc</u>	DAER		2009,	by
WILLIAM.	JAMES	SC 06	SIN -			
		_who pro	ved to me	on the	basis	of
satisfactory	evidence	to be t	the person(s) who	appea	ired
before me.						

Pamala Meeks, Notary Public



NOTIFICATION OF MULTICANDIDATE STATUS

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Washington DC 20008		8. TYPE OF COMMET! STATE PARTY OTHER	(1994)
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STATUS BY AFFILIATION: The committee submit	ted its Statement of C	Organization (FEC	FORM 1)
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affliction with:			
Committee Name: TransFund PAC			
FEC Identification Number: CCCCCCCCC			
		_	
STATUS BY QUALIFICATION:			
(a) candidates: The committee has made contrib	utions to the five (5) f	ederal candidates	inted
below (ONLY state party committees may leave			
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(E) Laura Richardson	House	CA 87	07/22/2007
(M) Al Wynn	House	MD 04	09/09/2008
(Tvr) Hank Johnson	House	GA 04	12/21/2007
(V) Mark Bahraner	House	MI 07	11/19/2007
(b) Contributore: The committee received a contri	bution from its 51st o	ontributor	
on: 00000000			
(c) Registration: The committee has been registe	red for at least 6 mor	who. FEC FORM 1	Wes
aubmitted on: <u>Carter2007</u>			
(d) Qualification: The committee met the above re	quirements on:	07/01/8008	
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ATTACHMENT (e-1)



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Donor name: Blackwell, Arthur
Cycle(s) selected: 2008
Start another search

Sort by Name
 Sort by Date (Descending)
 Sort by Amount

2 records found in 0.019 seconds. Total for this search: \$1,500

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BLACKWELL, ARTHUR GREEKTOWN CASINO LLC/INVESTOR 8/30/08 \$1,000 Kilpatrick, Carolyn Cheeks (D) DETROIT,MI 48202
BLACKWELL, ARTHUR GREEKTOWN CASINO LLC/INVESTOR 11/2/07 \$500 Kilpatrick, Carolyn Cheeks (D)

DETROIT,MI 48202

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contact the Center

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